

Joseph H. Harrington
Acting United States Attorney
Eastern District of Washington
Stephanie Van Marter
Assistant United States Attorney
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Mar 02, 2021

SEAN F. MCAVOY, CLERK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

V.

**[REDACTED] and
JERROD JUSTIN HALE**

Defendants.

4:21-CR-6008-SMJ
INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(vi), 846
Conspiracy to Distribute 400
grams or more of Fentanyl
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(vi), 18 U.S.C. § 2
Possession with the Intent to
Distribute 40 Grams or more
of Fentanyl
(Count 2)

21 U.S.C. § 853 Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by December 2020, and continuing until on or about March 2, 2021 in the Eastern District of Washington and elsewhere, the Defendants, [REDACTED] [REDACTED] and JERROD JUSTIN HALE, and other individuals, both known and unknown to the Grand

Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense: distribution of 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi), 846.

COUNT 2

On or about December 13, 2020, in the Eastern District of Washington, the Defendant, [REDACTED] knowingly and intentionally possessed with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi), (b)(1)(B)(vi), 846, as charged in this Indictment, the Defendants, [REDACTED] and JERROD JUSTIN HALE, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense.

If any forfeitable property, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

DATED this ____ day of March 2021.

A TRUE BILL

Foreperson

Joseph H. Harrington
Acting United States Attorney

Stephanie Van Marter
Assistant United States Attorney